

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

MEGAN VILLELLA, Individually and on  
Behalf of All Others Similarly Situated,

Plaintiff,

v.

CHEMICAL AND MINING COMPANY OF  
CHILE, INC., et al.,

Defendants.

Civil Action No. 1:15-cv-02106-ER-GWG  
(Consolidated)

CLASS ACTION

JOINT STIPULATION AND [PROPOSED]  
SCHEDULING ORDER GOVERNING  
SUMMARY JUDGMENT MOTIONS AND  
DAUBERT MOTIONS

WHEREAS, on October 11, 2019, the parties appeared for a status conference and the Court set a deadline for the filing of dispositive motions, if any, 30 days after the deposition of third-party witness Wayne Brownlee;

WHEREAS, the deposition of Wayne Brownlee took place on February 25, 2020;

WHEREAS, both parties may file *Daubert* motions in addition to any motions for summary judgment, and respectfully request that the Court waive its pre-motion letter and conference requirements set forth in Section 2.A.ii of the Court's Individual Rules of Practice;

WHEREAS, the parties have conferred and agreed, pending the Court's approval, to a schedule governing briefing on summary judgment and accompanying *Daubert* motions as set forth below;

Accordingly, IT IS HEREBY STIPULATED AND AGREED by the parties, through their undersigned counsel, subject to Court approval, as follows:

EVENT	DEADLINE
Motions for Summary Judgment and Accompanying <i>Daubert</i> Motions	March 26, 2020
Oppositions to Motions for Summary Judgment and Accompanying <i>Daubert</i> Motions	May 29, 2020
Replies in Support of Motions for Summary Judgment and Accompanying <i>Daubert</i> Motions	July 13, 2020

The pre-motion letter and conference requirements set forth in Section 2.A.ii of the Court's Individual Rules of Practice are hereby waived regarding the parties' *Daubert* and summary judgment motions.

Each party reserves the right to seek an extension of the above deadlines.

Dated: March 11, 2020

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By: /s/ Matthew S. Melamed  
MATTHEW S. MELAMED

By: /s/ Grant R. Mainland  
GRANT R. MAINLAND

**SO ORDERED.**

DATED: \_\_\_\_\_

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HONORABLE EDGARDO RAMOS  
UNITED STATES DISTRICT JUDGE